REMARKS

By this Amendment, claims 2, 4, 6-12, 14 and 15 are amended. Claims 1 and 5 are cancelled without prejudice or disclaimer, the subject matter of claim 1 incorporated into claims 2 and 4, the subject matter of claim 5 incorporated into claim 11. Applicants have also amended the Abstract to fully comply with all requirements.

Claims 2, 4 and 6-15 are pending. Reconsideration and allowance of the present application based on the previous amendments and the following remarks is respectfully requested.

Applicants appreciate the acknowledgment that claims 4 and 9-14 would be allowable if rewritten in independent form. By this Amendment, Applicants have rewritten claims 4 and 11 in independent form, and therefore Applicants respectfully submit that claims 4 and 11 are allowable. Applicants delay rewriting claims 9, 10 and 12-14 in independent form at this time so that the merits of their independent claim 15 can be reconsidered.

The drawings were objected to for including reference numeral 5 which is not mentioned in the description. Applicants have amended the drawings as indicated in the Drawing Change Authorization Request submitted herewith, deleting reference numeral 5. Accordingly, Applicants respectfully submit that the objection is overcome.

Claim 2 was rejected under 35 U.S.C. § 112, second paragraph, for alleged insufficient antecedent basis. Applicants have amended claim 2 for proper antecedent basis, and Applicants submit that the § 112 rejection is overcome and should be withdrawn.

Claims 1-3, 5, 6 and 15 were rejected under 35 U.S.C. § 102(b) over Thibault et al. (EPPN 0825506 A2). By this Amendment, Applicants have cancelled claims 1 and 5 without prejudice or disclaimer, and the rejection with respect to claims 1 and 5 is moot. Regarding remaining rejected claims 2, 3, 6 and 15, Applicants respectfully submit that Thibault et al. fails to disclose, teach or suggest all the features recited in the rejected claims.

For example, Thibault et al. fails to disclose, teach or suggest a control system comprising "an interactive user interface... utilizing configuration, control and management data maintained in at least one database of the control system and... being configured to modify content of the interactive user interface in response to requests or selections made by the mobile terminal and based on the configuration, control and management data retrieved from said at least one database of the control system, and to create control or configuration commands to the control system in response to selections or inputs made by the mobile terminal user in the interactive user interface," as recited in independent claim 2. Similarly, Thibault et al. fails to disclose, teach or suggest a control system comprising a "World Wide

Web (WWW) server utilizing configuration, control and management data maintained in at least one database of the control system... for providing at least one interactive WWW page which is accessible through a TCP/IP network and a data connection between the mobile terminal and an access server connected to the TCP/IP network... wherein said WWW server is configured to modify content of the at least one interactive WWW page in response to requests or selections made by the mobile terminal and based on the configuration, control and management data in said at least one database of the control system, and to create control or configuration commands to the control system in response to selections or inputs made by the mobile terminal user in the at least one interactive WWW page," as recited in independent claim 15.

The Office Action asserted that the front end 25(a) disclosed in Thibault et al. can be considered as an interactive interface. However, the front end 25(a) does not anticipate the claimed interactive interface for the following reasons.

Firstly, an object-based communication link is established in Thibault et al. between the client and the object manager 25(c) via the front end 25(a). In other words, the front end 25(a) and the object manager 25(c) are parts of the command manager. Secondly, the front end 25(a) does not provide an interactive user interface that utilizes configuration, control and management data maintained in at least one database of the control system. The front end is only a gateway through which the control communication between the object manager 25(c) and the JAVA applet flows.

In fact, the front end disclosed in Thibault et al. does not provide any kind of user interface. Neither does Thibault et al. disclose that such a user interface utilizes configuration, control and management data maintained in at least one database of the control system. Thibault et al. further fails to disclose that the interactive user interface is accessible by the mobile terminal through a dedicated data connection established over the cellular communication system.

To the contrary, Thibault et al. merely discloses a process control system, which is based on a client-server principle. Server 16 is connected to process control apparatuses, such as flow control valves, through a bus/network structure 30 and control stations 23a-23e. The control server consists of a HTTP server 20 (information server) and a command processor 25 comprising front-end 25a, interface section 25b, and an object manager 25c. A client consists of a workstation running a conventional web browser, which establishes a connection to the HTTP server 20 in order to retrieve a HTML page (a WWW page). This

page is displayed to the user who is able to give a command to transfer a JAVA applet from the HTTP server.

When the applet is executed in the client machine, it sends a request to the server 16 to establish a separate communications link to the command processor 25, *i.e.*, to a JAVA application operating at the server 16. The applet and the command processor 25 use this separate link for enabling exchange of messages over the network 18.

When the link has been established, the applet provides the user interface on the display of the client machine, using information provided via the separate (non-HTML) text messaging link, so that the operator can input names of the process control apparatuses the data of which are to be displayed. Then, in response to a user's command, the applet sends a request to open the objects processing the respective data in the object manager 25c. The object manager, and not the HTTP Information Server 20, inquires the desired data from the process control apparatuses 19a-19e, returns these values to the command processor 25a, which then generates and sends to the applet a text message which lists the data (see col. 9, lines 2-42).

Thus, Thibault et al. relies on an object-based connection over which an applet downloaded to the client machine communicates separately with a command processor and an object manager located in a server. The server digital data processor 16 of Thibault et al. does not use configuration, control and management data maintained in at least one database of a control system to create the contents of the user interface.

As explained above regarding the system of Thibault et al., the JAVA applet is requested and loaded from a HTTP server. When the applet is executed in the client machine, it sends to the server 16 a request to establish a separate communications link to the command processor 25, *i.e.*, to a JAVA application operating at the server 16. Then, in response to a user's command, the applet sends a request to open the objects processing the respective data in the object manager 25c. The object manager inquires the desired data from the objects distributed over the control stations 23a-23d, returns these values to the command processor 25a, which then generates and sends to the applet a text message which lists the data. In the system of Thibault et al., applets are loaded and run in the client machine separately for each connection.

Therefore, Thibault et al. does not disclose, teach or suggest a control system including an interactive user interface/World Wide Web (WWW) server and at least one interactive WWW page, as recited in independent claims 2 (and its dependent claim 3) and

15. Regarding rejected claim 6, Applicants respectfully submit that claim 6 is allowable at least by virtue of its dependence from allowable independent claim 11.

Claims 7 and 8 were rejected under 35 U.S.C. § 103(a) over Thibault et al. Applicants traverse the rejection because Thibault et al. fails to disclose, teach or suggest all the features recited in claims 7 and 8.

As explained above, Applicants have rewritten allowable claim 11 in independent form. Therefore, Applicants submit that claim 7 is allowable at least by virtue of its dependence from allowable claim 11. Regarding rejected claim 8, Applicants submit that claim 8 is allowable for at least the same reasons explained above regarding independent claim 15, from which claim 8 depends.

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Respectfully submitted,
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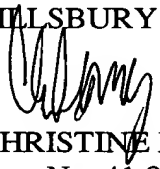

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